# Discharge Permits

"Control through Permit, order, or similar means..."

### Overview

- What is a Discharge Permit?
- Types of Permits
- When Can a General Permit Be Issued?
- When Can't a General Permit Be Issued?
- Required Permit Elements
- Monitoring and Reporting Specifics
- Choosing Effluent Limits
- What Else?

## What is a Discharge Permit?

- 403.8(f)(1)(i) "Deny or condition new or increased ..."
- 403.8(f)(1)(ii) "Require compliance with applicable ..."
- 403.8(f)(1)(iii) "Control through Permit, order, or similar means ..."
- A permit is
  - A means to control industrial users
  - An effective mechanism to ensure compliance
  - A federal requirement

# Types of Permits

403.8(f)(1)(iii) "... this control shall be achieved through individual permits or equivalent individual control mechanism ..."

- General Permit
  - 40 CFR 403.8(f)(1)(iii)(A)(1)
    - "At the discretion of the POTW ...."
- Individual Control Mechanism

### General Permit - Musts

- Have the same types of operations
- Discharge the same types of wastes
- Have the same effluent limitations
- Have similar monitoring requirements
- Be more appropriate than an individual permit

### General Permits – Can'ts

- Be used for production-based categorical facilities
- Be used for facilities where the standards are expressed as mass-based
- For facilities where limits are based on the Combined Wastestream Formula
- Where net-gross calculations are used

## **Issuing General Permits**

- The SIU must
  - File a written request for coverage
  - Provide contact information
  - Identify production processes
  - Identify types of wastes generated
  - Identify location(s) for monitoring
  - Request monitoring waivers 403.12(e)(12)

# Issuing General Permits (cont)

- The POTW must retain
  - A copy of the General Permit
  - Documentation supporting the determination that the specific SIU meets the appropriate criteria – 403.8(f)(1)(iii)(A)(1)
  - A copy of the SIU request 3 years after expiration of the permit

# **Required Elements**

- Statement of duration (5 year maximum)
- Statement of non-transferability
- Effluent Limits & Best Management Practices
- Self-monitoring, sampling, reporting, notification and recordkeeping requirements

## Required Elements (cont.)

- Identification of pollutants to be monitored
- Sampling location, sampling frequency and sample type
- Statement of applicable penalties
- Applicable compliance schedules
- Requirements to control Slug Discharges

# Monitoring & Reporting

- Identification of Pollutants
- Self-monitoring
- Where to sample
- How often to sample
- How to sample
- Reporting
- Notification
- Recordkeeping

### **Effluent Limits**

- General prohibitions (40 CFR 403)
- Categorical Pretreatment Standards
- Local Limits
- State and Local Law
- Combined Wastestream Formula
  - Don't overlook minor dilute flows
  - Pollutant limits must be measurable

Don't forget  Clear description of operations Analytical requirements - 40 CFR 136 and State law Fact Sheet Cover Letter Comment or Appeal period	- - - -	
Questions?	_	
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